

UNITED STATES BANKRUPTCY COURT FOR
THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

IN RE:)
) Case No.: 23-16133
)
 Maus Enterprises, Inc.,) Chapter 7
)
 Debtor(s).) Hon. Deborah L. Thorne
)

NOTICE OF MOTION

PLEASE TAKE NOTICE that, on January 17, 2024, at 10:30 a.m., or as soon thereafter as counsel may be heard, I will appear before the Honorable Deborah L. Thorne, or any judge sitting in that judge's place, **either** in courtroom 682 of the Everett McKinley Dirksen United States Courthouse, 219 S. Dearborn Street, Chicago, IL 60604, and present the **Trustee's Motion to Employ Accountant**, a copy of which is attached.

Important: Only parties and their counsel may appear for presentment of the motion electronically using Zoom for Government. All others must appear in person.

To appear by Zoom using the internet, go to this link: <https://www.zoomgov.com/>. Then enter the meeting ID and passcode.

To appear by Zoom using a telephone, call Zoom for Government at 1-669-254-5252 or 1-646-828-7666. Then enter the meeting ID and passcode.

Meeting ID and passcode. The meeting ID for this hearing is 160 9362 1728, and there is no passcode. The meeting ID and passcode can also be found on the judge's page on the court's web site.

If you object to this motion and want it called on the presentment date above, you must file a Notice of Objection no later than two (2) business days before that date. If a Notice of Objection is timely filed, the motion will be called on the presentment date. If no Notice of Objection is timely filed, the court may grant the motion in advance without calling it.

Dated: January 4, 2024

Respectfully submitted,

Reed Heiligman (No. 6294312)
HILTZ ZANZIG & HEILIGMAN LLC
848-443 Dodge Ave.
Evanston, IL 60202
Telephone: 312.566.9008
reed@hzhlaw.com

**AJA CARR FAVORS, NOT
INDIVIDUALLY BUT AS CHAPTER 7
TRUSTEE**

By: /s/ Reed Heiligman
(Attorney)

CERTIFICATE OF SERVICE

I, Reed Heiligman, an attorney, hereby certify that, on January 4, 2024, I caused a true and correct copy of the foregoing **Notice of Motion and Trustee's Motion to Employ Accountant** to be served on the following via the indicated means:

VIA CM/ECF:

- **Aja M Carr Favors** trustee@favorslawfirm.com, afavors@ecf.axosfs.com; bkadmin@axosfs.com
- **William J Factor** wfactor@wfactorlaw.com, wfactorlaw@gmail.com; bsass@wfactorlaw.com; wfactor@ecf.courtdrive.com; wfactormyecfmail@gmail.com; factorwr43923@notify.bestcase.com
- **Reed Heiligman** reed@hzhlaw.com, awhitt@hzhlaw.com
- **Patrick S Layng** USTPRegion11.ES.ECF@usdoj.gov
- **Justin R. Storer** jstorer@wfactorlaw.com, bsass@wfactorlaw.com; jstorer@ecf.courtdrive.com
- **Samuel C. Wisotzkey** swisotzkey@kmksc.com, kmksc@kmksc.com

VIA US MAIL:

Wesler & Associates CPA, PC
Attn: Cheryl Wesler
PO Box 19016,
Kalamazoo, Michigan 49019

/s/ Reed Heiligman

**IN THE UNITED STATES BANKRUPTCY COURT FOR
THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

| | | |
|-------------------------|---|------------------------|
| IN RE: |) | |
| |) | Case No.: 23-16133 |
| |) | |
| Maus Enterprises, Inc., |) | Chapter 7 |
| |) | |
| Debtor(s). |) | Hon. Deborah L. Thorne |
| |) | |

TRUSTEE’S MOTION TO EMPLOY ACCOUNTANT

Aja Carr Favors, not individually but as Chapter 7 Trustee (the “Trustee”) for the bankruptcy estate of Maus Enterprises, Inc. (the “Debtor”), pursuant to 11 U.S.C. §327(a), respectfully requests entry of an order authorizing her to employ Cheryl Wesler and the firm of Wesler & Associates CPA, PC (collectively “Wesler”) as her accountant to render the accounting services described herein, and states as follows:

JURISDICTION

1. The Court has jurisdiction over this motion pursuant to 28 U.S.C. §§157 and 1334. Venue is proper in this district pursuant to 28 U.S.C. §§1408 and 1409. Consideration of the motion is a core proceeding pursuant to 28 U.S.C. §157(b)(2)(A) and (O).
2. The statutory basis for the relief sought in this motion is 11 U.S.C. § 327(a).

BACKGROUND

3. On November 30, 2023, the Debtor filed a voluntary petition for relief under chapter 7 of Title 11 of the United States Code, 11 U.S.C. §§ 101, et seq. (the “Bankruptcy Code”).
4. The Trustee is the duly appointed chapter 7 trustee of the Debtor.

RELIEF SOUGHT

5. The Trustee requires the assistance of an accountant to perform her duties under the Bankruptcy Code, including the preparation of necessary tax returns and any other accounting or financial advisory tasks as required by the Trustee.

6. The Trustee seeks authorization, pursuant to 11 U.S.C. § 327(a), to employ Wesler as her accountant. The Trustee has selected Wesler as her accountant for this bankruptcy case because they are experienced in providing services to Chapter 7 trustees.

7. To the best of the Trustee's knowledge, Wesler does not have any connections with the Debtor, its creditors, any other party in interest, their respective attorneys and accountants, the United States Trustee, or any other person employed in the office of the United States Trustee. Wesler's affidavit respecting these matters is attached hereto and incorporated as part of this motion as **Exhibit A**.

8. The Trustee has sent electronic notice of this motion to the Debtor's counsel, all parties who are currently on the Court's Electronic Mail Notice List, and the U.S. Trustee and no further notice should be required.

WHEREFORE, Reed Heiligman, not individually but as Chapter 7 Trustee for the bankruptcy estate of Maus Enterprises, Inc., respectfully requests that the Court enter an order authorizing the Trustee to employ Cheryl Wesler and the firm of Wesler & Associates CPA, PC, as her accountants to perform the accounting services described in this motion and granting such other and further relief as this Court deems just.

Dated: January 4, 2024

Respectfully submitted,

Aja Carr Favors, not individually but as
chapter 7 Trustee

By: /s/ Reed Heiligman
Attorney

Reed Heiligman (No. 6294312)
HILTZ ZANZIG & HEILIGMAN LLC
848-443 Dodge Ave.
Evanston, Illinois 60202
Telephone: 312.566.9008

EXHIBIT A

**UNITED STATES BANKRUPTCY COURT FOR
THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

| | | |
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| |) | |


Cheryl Wesler, being first duly sworn on oath, deposes and states as follows:

1. She is a Certified Public Accountant, license by the State of Michigan.
2. She conducts business under the name of Wesler & Associates CPA, PC, PO Box 19016, Kalamazoo, Michigan 49019.
3. To the best of her knowledge, neither she nor any associate of her Firm is a creditor of the Estate, or has or represents an interest of the Estate, the United State Trustee or any persons employed in the office of the United State Trustee.
4. To the best of her and her Firm's knowledge, applicant is a disinterested person within the meaning of 11 U.S.C. § 101(14).
5. She has represented the Trustee in connection with other estates in which she has been appointed.
 - a. She proposes to perform the following accounting services for the Trustee:
 - b. Preparation of necessary income tax returns.
 - c. Such other matters, as the Trustee deems necessary.
 - d. She is experienced in matters of this nature.
6. She proposes to perform the above-described accounting services at the following table of usual and customary rates charged by his Firm, staff accountants and bookkeepers.
7. She will seasonably amend this declaration to the extent that she becomes aware of relationships for which disclosure is appropriate.

As provided by 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing is true and correct.

Dated:

January 3, 2024



CHERYL WESLER, CPA
Wesler & Associates CPA, PC

**ATTACHEMENT TO AFFIDAVIT FOR ORDER APPROVING
EMPLOYMENT OF WESLER & ASSOCIATES, CPA, PC
AS ACCOUNTANTS**

The Estate desires to employ Wesler & Associates, CPA, PC as accountants pursuant to Section 327 of the Bankruptcy Code. The professional services to be rendered by Wesler & Associates, CPA, PC are as follows:

- Preparation of necessary income tax return.
- Such other matters as the Trustee deems necessary.

Wesler & Associates, CPA, PC intends to submit a fee petition to the Estate for services rendered based upon actual hours spent and agreed-upon rates as listed in the enclosed schedule, plus actual out-of-pocket expenses including ground transportation, telephone, and report reproductions. Wesler & Associates, CPA, PC requests payment of its petition based upon the foregoing rates, plus reimbursement of actual expenses incurred, such payment to be made pursuant to interim or final allowances of compensation to be fixed by the Court. Proper application will be made to the Court in support of said time and payments.

The following hourly rates will be in effect for specific personnel:

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|---------------------------|--------------|
| Cheryl Wesler, CPA | \$325 |
|---------------------------|--------------|

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|----------------------------|--------------|
| Kristin Salmon, CPA | \$225 |
|----------------------------|--------------|

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|-------------------------------|--------------|
| Other Wesler CPA Staff | \$125 |
|-------------------------------|--------------|